

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Retail Access Optimization Initiative

Docket No. N2011-1

NATIONAL NEWSPAPER ASSOCIATION
INTERROGATORIES TO POSTAL SERVICE WITNESS BOLDT
NNA/USPS T1 1-16
(August 26, 2011)

Pursuant to Rules 25 through 28 of the Commission's Rules of Practice, National Newspaper Association (NNA) hereby submits interrogatories and requests for documents to United State Postal Service Witness Boldt. Document requests include requests for responsive information for any record within the Postal Service's possession, whether in printed or electronic form. NNA requests that if the witness cannot respond to an interrogatory, the Postal Service will refer the question to a competent witness who can attest to the response.

Respectfully submitted,

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NNA/USPS T1-1 Please refer to the Postal Service's institutional response to Presiding Officer's Information Request No 1, question 2.

Please explain in detail how revenue derived from a local Periodicals mailer entering in a candidate facility with postage paid at that facility would be considered in the Postal Service's analysis of that facility's overall revenue. If the revenue would not be considered, explain why it would not.

NNA/USPS T1-2 Please confirm that post offices on the Postal Service's candidate list of 3,650 facilities could potentially be entry offices for local Periodicals mail.

NNA/USPS T1-3 Has the Postal Service examined the revenue accounts of each of the 3,650 candidate offices to determine whether Periodicals mail revenues appear in those accounts? If not, does it intend to do so before making a final determination on discontinuing those offices?

NNA/USPS T1-4 If a candidate office fell under scrutiny for closing because its revenues were under \$100,000 a year, but the Postal Service discovered a local Periodicals mailer producing revenues for that office that would lift the office above \$100,000 if counted, would that discovery be sufficient to remove that candidate office from a discontinuation list? If not, please explain why not. If that element alone would not cause a candidate office to be removed from the list, would that element influence the Postal Service favorably toward keeping that office open at current service levels?

NNA/USPS T1-5 If a candidate office fell under scrutiny for closing because its revenues were under \$100,000 a year, but the Postal Service discovered a local Standard class mailer producing revenues for that office that would lift the office above \$100,000 if counted, would that discovery be sufficient to remove that candidate office from a discontinuation list? If not, please explain why not. If that element alone would

not cause a candidate office to be removed from the list, would that element influence the Postal Service favorably toward keeping that office open at current service levels?

NNA/USPS T1-6 Please confirm that local newspapers mailed under Periodicals permit sometimes enter mail at a local post office, but drop time sensitive copies of those issues for same day or next day delivery at nearby offices, under a practice called "exceptional dispatch," authorized by Domestic Mail Manual Section 707.28.3.

NNA/USPS T1-7 With respect to activities of local newspapers mailed under Periodicals permits that exercise exceptional dispatch privileges, please respond to the following:

- a. Will the Postal Service examine the candidate offices to determine whether local newspapers mailed under Periodicals permits are carrying out destination mail drops under exceptional dispatch privileges?
- b. Would the discovery of a local newspaper's use of exceptional dispatch at any given candidate office influence the Postal Service's decision in favor of continuing service at that office? If not, please explain why not.

NNA/USPS T1-8 Do any contract postal units (CPUs) accept entry of Periodicals mail? Do any CPUS accept entry Of Standard Mail?

NNA/USPS T1-9 Do any contract postal units (CPUs) accept local newspaper mail dropped under exceptional dispatch privileges? If not, why not?

NNA/USPS T1-10 Do any contract postal units operate as an entry office for any type of bulk business mail, other than newspapers? Please explain your response.

NNA/USPS T1-11 With respect to Village Post Offices:

- a. Please supply any Requests for Proposal, with proprietary information redacted, that the Postal Service has used or intends to use to solicit bids from VPO operators.
- b. Please refer to the Postal Service's response to POIR No 1, question 11, where it is stated "several hundred inquires (sic) from interested vendors were received within days of the concept being publicly announced in July 2011. Of those inquiries, how many have received responses from the Postal Service as of the date of your response to this question? How many have actually issued bids to the Postal Service?
- c. In a case where the Postal Service expects to replace an existing post office, branch or other facility on the candidate list with a VPO, will it put the VPO in place before the closing, after the closing or simultaneously?
- d. Does the Postal Service expect VPO bidders to provide every service solicited by the Postal Service? Could a VPO offer to provide fewer services? More services?
- e. Is the Postal Service approaching any large commercial vendors--such as a national bank or retail store--to propose operating more than one VPO?
- f. If the Postal Service received a proposal from a potential VPO operator to operate 100 percent of the needed VPOs, would that proposal be accepted?
- g. Does the Postal Service expect a VPO operator to have a legal residence or corporate home in the community where the VPO operates?
- h. Will VPO bidders be required without exception to provide post office boxes in their facilities? If not, please explain why not.
- i. If a post office provided community services besides mail distribution and retail postal services, such as offering a community meeting room, would the Postal Service expect a VPO bidder to provide such a service? If a VPO bidder proposed such a service, regardless of the Postal Service's

expectations, would that proposal be more favorably considered than a proposal from a bidder uninterested in providing such a service?

- j. Will the Postal Service require a VPO that replaces a post office where a local newspaper mailer previously entered mail to provide mail acceptance services for that local newspaper? If not, why not?
- k. Will the Postal Service require a VPO that replaces a post office where a local newspaper mailer previously dropped exceptional dispatch copies that are carrier-route, walk-sequence sorted to receive those copies for delivery by a postal or contract carrier? If your response is negative, please explain why the Postal Service could not require those offices to provide a repository service to hold this mail for carrier distribution.

NNA/USPS T1-12. Please list all means that the Postal Service expects to use to notify the public that a facility is a candidate for consolidation or closure and discuss whether each of these means will be used in each circumstance.

NNA/USPS T1-13. Are you aware of any circumstances in a time period beginning with your service in Central Illinois district through the date of your response when the sole notice provided to the public of a potential facilities closure or consolidation occurred through a posting in a post office, including but not limited to the candidate office?

NNA/USPS T1-14. Does the Postal Service typically carry out a postal patron mailing to the residences and businesses within a candidate office to alert it to the consideration of closing or consolidation? If so, how is the cost of producing and mailing that alert recognized by the Postal Service?

NNA/USPS T1-15. Are you aware that every state in the United States has a statutory provision or judicially-mandated process to provide notice to the public of significant

public transactions or events? Has the Postal Service considered following these customary public notice practices in alerting the public to its consideration of a closing or consolidation?

NNA/USPS T1-16. Please state the Postal Service's total cost for television or radio advertising in Fiscal Year 2010 and Fiscal Year 2011. Have any of those expenditures been used to alert the public to a potential closure or consolidation? If so, please provide an electronic copy of those advertising messages.